



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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OCT 23 2014

Ref: 8EPR-N

Will Meeks, Assistant Region Director
U.S. Fish and Wildlife Service Mountain-Prairie Region
c/o Laurie Shannon, Planning Team Leader
Division of Refuge Planning
P.O. Box 25484
Denver, CO 80225-0486

Re: San Luis Valley National Wildlife Refuge Complex
Comprehensive Conservation Plan Draft Environmental
Impact Statement, CEQ #20140247

Dear Mr. Meeks:

The U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the U.S. Department of Interior Fish and Wildlife Service (USFWS) August 2014 Draft Environmental Impact Statement (EIS) for the San Luis Valley National Wildlife Refuge Complex (SLVNWR) Comprehensive Conservation Plan (CCP). Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

Background

The SLVNWR includes Monte Vista (about 14,835 acres), Alamosa (about 10,290 acres) and Baca (about 92,500 acres) National Wildlife Refuges in parts of Rio Grande, Alamosa, Costilla, and Saguache Counties within the San Luis Valley of south central Colorado. The Draft CCP/EIS is intended to provide long-term guidance for the management of each refuge in the SLVNWR, including refuge programs and activities. Among significant issues identified through scoping were habitat and wildlife management, water resources, landscape conservation and wilderness review, and visitor services.

Alternatives identified in the Draft CCP/EIS include: Alternative A (No Action), Alternative B (Wildlife Populations, Strategic Habitat Restoration, and Enhanced Public Use), Alternative C (Habitat Restoration and Ecological Processes), and Alternative D (Maximize Public Use). Based on conversations between our staffs, we understand that Alternative B is the USFWS's Preferred Alternative and would include an emphasis on maintaining/restoring natural and modified habitats; facilitating the protection, restoration, and conservation of important water resources; and enhancing/expanding compatible wildlife-dependent public uses on all three refuges. General public access would be improved on the Monte Vista and Alamosa NWRs and established on the Baca NWR.

The USFWS has done a commendable job of addressing scoping comments received for this Draft CCP/EIS. Since most of the EPA's initial scoping comments have been addressed, our remaining water resource-related recommendations are intended to further inform the decision-maker and the public of potential impacts to public health and the environment. Based on our review, we are rating this Draft EIS as "Lack of Objections," as discussed in more detail at the end of this letter.

Water Resources

We appreciate the Draft EIS discussion related to water resource characterization of the San Luis Valley and support the USFWS's efforts to restore and protect the important water resources of the SLVNR. We recommend that the Final EIS include an expanded water resources discussion, as discussed below.

Hydrology

The Hydrology Section, beginning on p. 165, discusses the drainage area of the Rio Grande River. We suggest expanding this discussion to include the length of the river and its tributaries, in river miles, as a useful aid in understanding the hydrology of the region. This information may also facilitate better understanding of the Water Quality Monitoring Section's discussion of impaired water bodies (discussed further below) since the impaired segments include information about length.

Water Quality Monitoring

The Water Quality Monitoring Section, beginning on p. 176, references outdated assessment data for the Rio Grande headwaters watershed. The EPA recommends that the Final EIS be updated to clarify that the Colorado Department of Public Health and Environment (CDPHE) determines water quality standards and impairment status of waters under the Clean Water Act (CWA). The EPA recommends that the Final EIS reference Colorado's 2012 CWA Section 303 (d) Impaired Waters List, as approved by the EPA, and the 2012 Water Quality Monitoring and Assessment Report (305(b) Report), and include this information in the discussion of water quality trends observed in, and downstream of, the planning area.

A map showing all impaired water bodies within the planning area, as well as impaired waters downstream of the planning area, would be a useful tool to convey the latest available information regarding existing water quality. For ease of identification, we suggest including a table of CWA Section 303(d)-listed waters and water body segment ID numbers.

In addition, if CDPHE has not assessed the water quality in all water bodies within the planning area, then we recommend that the Final EIS list such water bodies and indicate that the water quality condition has not yet been assessed by CDPHE. For your information, the Water Quality Report and 303(d) list may be accessed at <https://www.colorado.gov/pacific/cdphe/wqcc-reports-and-plans>.

We also recommend that the Final EIS include up-to-date information about Total Maximum Daily Loads (TMDLs) for impaired waters in the area of potential impacts. Information regarding TMDLs may be accessed at <https://www.colorado.gov/pacific/cdphe/tmdl-río-grande-river-basin>.

Impacts of Roads on Water Resources

We appreciate the Draft EIS discussion related to potential soil impacts from proposed roads, parking areas and trails on the three refuges. We recommend expanding this discussion to describe related potential impacts on water resources and steps that will be taken to reduce these impacts. We recommend that specific attention be paid to road surface, road density, number of road stream crossings, road drainage and surface erosion, culvert sizing and potential for washout, culvert allowance for fish migration, effects on stream structure and seasonal/spawning habits, and impacts to riparian habitats.

The EPA's general recommendations regarding roads include the following measures:

- Locate roads away from streams and riparian areas where possible;
- Locate roads away from steep slopes, landslide prone areas, and erosive soils;
- Minimize the number of road stream crossings;
- When road stream crossings are unavoidable, construct during periods of low flow to avoid fish spawning and incubation periods, and/or dewater relevant stream segments prior to construction;
- Provide adequate drainage and control of erosion to avoid routing sediment to streams;
- Use bottomless or textured bottom culverts if possible; and
- Design roads to allow for natural drainage patterns.

The EPA's Rating

Based on our review, the EPA is rating the Draft EIS Preferred Alternative as "Lack of Objections" (LO). The "LO" rating means that the EPA has not identified any potential environmental impacts requiring substantive change to the Preferred Alternative but may have disclosed opportunities for application of mitigation measures that can be accomplished with no more than minor changes to the proposed action. Please refer to <http://www.epa.gov/compliance/nepa/comments/ratings.html> for a description of the EPA's rating system.

We appreciate the opportunity to comment on this document and hope our suggestions will assist you with preparation of the Final EIS. Please contact us if additional explanation of these comments would be helpful. You can reach me at 303-312-6704, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,



Philip S. Strobel
Acting Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

